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Judith L. Cortey  
Rebecca H. Gordon  
Graham M. Wilson  
PHONE: (202) 628-6600  
FAX: (202) 654-9194

EMAIL: [JCortey@perkinscoie.com](mailto:JCortey@perkinscoie.com)  
[RGordon@perkinscoie.com](mailto:RGordon@perkinscoie.com)  
[GWilson@perkinscoie.com](mailto:GWilson@perkinscoie.com)

OFFICE OF GENERAL  
COUNSEL

700 Thirteenth Street, N.W., Suite 600  
Washington, D.C. 20005-3960  
PHONE: 202.654.6200  
FAX: 202.654.6211  
[www.perkinscoie.com](http://www.perkinscoie.com)

## HAND DELIVERY

February 14, 2011

Kim Collins  
Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: MUR 6445

Dear Ms. Collins:

We write as counsel to the Democratic National Committee and Andrew Tobias, Treasurer, (collectively, the "DNC") in response to a complaint filed with the Federal Election Commission ("FEC" or "Commission") by Jeff Larson on December 20, 2010 (the "Complaint").

The Complaint alleges that the DNC accepted a contribution from a "foreign national" in violation of 2 U.S.C. § 441e. However, the contributor in question, Edward John Izzard, is not a "foreign national." It is our understanding that Mr. Izzard is a "lawfully-admitted permanent resident," he has a "green card," and is thus permitted to make contributions to the DNC under 2 U.S.C. § 441o(b)(2).<sup>1</sup> Additionally, when the DNC accepted the contribution in question, there were no facts that would lead a reasonable person to conclude or inquire whether Mr. Izzard was a foreign national under 11 C.F.R. § 110.20(a). As Mr. Larson acknowledges in a follow-up letter to the FEC, the

<sup>1</sup> Published reports confirm that Mr. Izzard has a "green card." See, e.g., Rachel B. Hassen-Berger, "FEC complaint filed against Franken committee," *Minneapolis Star-Tribune* (Dec. 16, 2010) available at [http://www.startribune.com/politics/blogs/112033274.html?elr=KArks:DCiUec7PaP3E77K\\_Qc::D3aDhUiacyKUqci\\_aec8O7EvUr](http://www.startribune.com/politics/blogs/112033274.html?elr=KArks:DCiUec7PaP3E77K_Qc::D3aDhUiacyKUqci_aec8O7EvUr).

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Complaint should thus be immediately dismissed. The Commission should find no reason to believe that the DNC violated the Act.

Very truly yours,

A handwritten signature in black ink, appearing to be "Judith L. Corley", with a long horizontal flourish extending to the right.

Judith L. Corley  
Rebecca H. Gordon  
Graham M. Wilson  
Counsel to the Democratic National Committee

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